

The overall readability and flow of the document is very good. We would like to compliment the Revision Team on the efforts they have put into the Proposed Action document specifically. We would also like to have the opportunity to review and comment on the monitoring plan when a draft is available.

Following are the consensus comments of the ERC and EWG Collaborative Groups.

Watershed pg 15-17

FW-DC-WTR pg 15

04 The timing, variability, and water table elevation in groundwater aquifers are within the natural range of variability. Has this been described and if so, where?

Can this be achieved in stream corridors which have been heavily impacted by historic mining? We suggest adding a statement that will address systems that have been altered by past activities to the point that the NRV has been altered.

05 This seems very hard to achieve in TenMile and McClellan. These are high to moderate severity fire regimes, not surface fire regimes. Low intensity may be more doable than surface fires. We suggest changing the wording to “Maintain the natural diversity of vegetation and patch sizes that limit the extent of high intensity fires in municipal watersheds.”

07 Is “natural” achievable in highly altered drainages? Please add a caveat or a separate DC statement for these systems,

08 Please ensure “reference ranges” are defined and note where this information can be found.

09 Wetland and groundwater dependent ecosystem vegetation communities are

We suggest adding “dominated by appropriate native species”. Again, the natural range of variability must be defined and referenced. Also, there may need to be a caveat or additional statements to cover highly altered systems.

FW-GO-WTR pg 16

Please add this goal:

Develop a quantitative understanding of all watersheds across the Forest.

FW-OBJ-WTR

Please add this objective:

Complete mapping and characterization of priority watersheds. Develop a strategic plan to accomplish this.

Comment on this section—it is striking that there is no mention of livestock grazing in relation to riparian/wetland/spring management in guidelines for this section. It will take a lot of change in some areas of livestock use to begin to move toward the DC's and this should be highlighted. We would suggest moving all livestock related standards and guides for aquatic systems to one section for clarity.

We suggest adding a standard like "Livestock grazing will occur in such a manner as to be compatible with these desired conditions".

Fish and Aquatic Habitat pg 17-19

DC 01 Essential characteristics of this resilience are healthy, functioning aquatic, riparian, upland, and wetland ecosystems [please add "that function within the NRV".] Please reference where NRV is described.

05

"not degraded to levels that favor " could be stated more positively as "are maintained in conditions that favor native aquatic species

FW-GO-FAH pg 18

Please add a goal to maintain and recover westslope cutthroat trout populations to a sustainable level.

FW-OBJ-FAH

The objective of 2 chronic sediment source repair forestwide seems very low. I would think at least one per GA would be more appropriate and very doable over a five year period.

FW-GDL-FAH pg 19

03 prevent cattle from loitering in streams. We suggest changing this to "will apply best management practices to insure the grazed areas move toward desired conditions".

As we noted above, the livestock standards and guidelines should be in one place. The livestock guidelines should apply to all streams not just fishery streams, which it appears may be the case since they are here. It may be more appropriate to have them in the WTR section.

Conservation Watershed Network (CWN) pg 19-20

FW-OBJ-CWN pg 19

"Repair 2 road/stream crossings every 5 years at locations where chronic sediment sources"

This seems very conservative. We suggest that 1 crossing per GA be repaired over a 5 year period. Even this seems conservative.

Please address Watershed Restoration Action Plans or their equivalent in an objective here.

Riparian Management Zones (RMZ) pg 20-22

FW-DC-RMZ please add a DC for highly altered RMZ's.

FW-OBJ-RMZ

Please add an objective to "Complete mapping and characterization of the priority RMZ's, based on the Watershed Restoration Plans (or their equivalent)."

FW-GDL-RMZ

04 please insert after "temporary roads," unless an analysis clearly demonstrates it is the best location for a stream crossing to meet DC's." delete "except where necessary for stream crossings".

06 and 09 appear to be overlapping.

Soil and Geology (SOIL) pg 23-25

FW-DC-SOIL

Table 3

Nutrient cycling—please add "ecological sites or equivalent".

Support and Stability: We suggest replacing "expected ranges for soil and habitat type" to "within NRV, ecological sites or equivalent. " If habitat type is intended for forested systems please clarify for other systems.

FW-GDL-SOIL

04—85% is a high number. Please define this parameter better, as in relation to pre-management, undisturbed sites... A timeframe to achieve 85% is important.

05 "expected levels" is nebulous. We suggest removing this. If it stays please clarifying how this would be applied to fire. 1 centimeter is quite high for some types. How does this apply to grassland/shrubland?

Air—no comments. It looks good

Fire and Fuels Management (FIRE) pg 25- 27

FW-DC-FIRE

01—This DC should include all ecosystems; please either explain “forests” is all inclusive in terms of vegetation types or revise to “burned forest and nonforest condition”. “See also Forested and NonForested Vegetation and Wildlife”.

03—Please revise this statement to “negative fire effects” which is inferred but may not be obvious.

05—Please change “natural fires” to “all wildland fires”. We believe this is statement should be all inclusive.

FW-GO-FIRE

Please add goal 02: Prioritize land management activities in those areas where adjacent landowners/managers are doing fuel mitigation work.

FW-OBJ-FIRE

01—these acres seem very conservative and are inconsistent with NRV. We would like to see a minimum of 15,000 acres with no upper limit. We also believe unplanned ignition acres should be handled separately from planned ignitions. This guideline should relate to the vegetation NRV. Please add “(see FW-OBJ-VEGF-01 and FW-OBJ-VEGNF-01) to meet other resource Desired Conditions”.

02—Please remove “on at least 10 percent of the ignitions”. We believe there is no need to put a number limitation on this, and that this objective should be standard operating procedure.

FW-STD-FIRE

02—This is a confusing statement. It would be more clear to explain that fire managers and other resource specialists as appropriate will assess each fire and will make a recommendation to the Line Officer if the fire could be managed for resource benefits

FW-GDL-FIRE

Please add 02--Use both planned and unplanned ignitions to achieve resource desired conditions and protect adjacent highly valued resources.

Vegetation pg 27

This is a well written introduction.

VEGT pg 28

We recommend that most of the paragraphs on page 29 through the first partial paragraph on page 20 should be moved to the terrestrial section. Most of this verbiage applies to nonforested vegetation as well as forested. Table 4 should be in this section. The PVT's need to have narrative describing them. The names alone are not descriptive enough for people to understand. Fire regimes need to be

described in some detail here rather than the glossary. If they stay in the glossary people should be specifically pointed to the glossary.

VEGF pg 29-38

We recommend that the forested vegetation section start with the second paragraph on page 30.

One issue with the potential vegetation ranges is that without fire trees have increased significantly in density and in extent. Many areas that are now 40% cover plus were likely in the 25-40% cover class, near the lower density class. The trees that are now 10-25% density pose the biggest question. It is likely that some portion of the area currently classified as forested (10%+ canopy cover) was very likely a savanna (5-10%) or even a grassland or shrubland (<5% tree cover) in NRV. Many of these lands also supported mountain big sagebrush, as evidenced by the skeletons in the understory when the canopy was less than about 25% canopy cover. Sagebrush is an important species that is decreasing in extent and distribution along with other shrubs and grassland. We think it is important to have a desired condition that reclaims the extent and distribution of these types, savannas, shrublands and grasslands. Sagebrush and grassland species can only thrive in open grown tree canopies (25% or less) or open grasslands. Some of the land for that will come out of the currently classified forestland and should be addressed if it can't be quantified.

The forested vegetation needs a table with a short description for the pvts similar to that in the nonforested section. This will be more understandable for the reader.

FW-DC-VEGF

15--Please add a desired condition that addresses the understory. This is applicable to the warm dry types . Language such as “Understory plants occur in distribution and density that would have occurred under natural disturbance regimes (or NRV). The understory is resilient in response to disturbance such as fire and resistant to nonnative invasion. “

FW-OBJ-VEGF

01--The numbers in this objective need to be clarified. We recommend showing the treatment acres from fuels, forested vegetation and nonforested vegetation together under terrestrial vegetation so that it is clear when acres are additive. We would like to see maintenance acres addressed here as well.

VEGNF

FW-DC-VEGNF

01--There is no reference to NRV here—that is very important for these types. Please add a goal for establishing/maintaining NRV for grasslands/shrublands/savannas particularly as it relates to “natural” extent.

Table 14.

Xeric grassland—halfshrubs and shrubs are an important component (less than 10% cc) in these grasslands. Blue grama is an important grass here.

Mesic grassland—unlikely that blue grama (misspelled in the table) would be present but timber oatgrass (*Danthonia*) and sedges would be.

Mesic shrubland—should include rough fescue. Bitterbrush should be listed in the shrubs.

Riparian/wetland—should include aspen. This includes forested riparian areas and may need to be crossreferenced in the forested section or at least noted.

Anaerobic is misspelled

Savannas are minimally addressed. They should be included in table 14 as by definition they are not included in the warm dry types (5-10% canopy). The glossary doesn't have a lower limit but we would suggest 5% so they can be mapped and managed appropriately.

05 As stated earlier, there has been a loss of the extent of grassland/shrubland/savanna that is significant. We recommend removing an upper limit for this type, or reference historic maps and photos to help establish the historic extent.

06 This is confusing as we believe it is describing a habitat type accurately, but by definition these types are not represented in the forested section by warm dry potential vegetation types. The reference to the forested potential vegetation types should be removed.

07—Soil crusts, cryptogams—lichens and mosses, should be addressed at some level in the DC.

FW-OBJ-VEGNF

Please see the earlier comment on the forested vegetation objective. In addition we would like clarification on what invasive species are being addressed here. If these are noxious weeds that should be specified. Some people view conifers and juniper as invasive in a grassland context.

FW-GDL-VEGNF

Please clarify how the third bullet would be applied and what green stripping is.

PRISK pg 41-42

Good section. No comments.

POLL pg 42-43

Good section. No comments.

INV pg 42-43

“Should” is used in the introduction. We would question when and why this would not be done? We think the word should be “will” with caveats if necessary.

The following sentence is troubling: “These conditions should be addressed within the bounds of resource constraints with future actions balanced with recognition and attention given to the **relative return on investment**” it is not clear what investment is being evaluated. If the relative return includes biodiversity, native species and native soil biota, that is a fair evaluation. If the relative return is strictly about the cost of treatment this is too narrow.

FW-DC-INV

Please add 05 “Longterm control treatments are emphasized when feasible” inserted here.

FW-OBJ-INV

02--Please add an objective that includes keeping an up to date accurate map of infestations including densities.

03--Please add an objective that areas prioritized when adjacent landowners are undertaking control actions.

Wildlife pg 44-48

FW-DC-WL

02 please add “within the appropriate vegetation natural range of variation”

03 please add “within the appropriate vegetation natural range of variation”

FW-DC-WLRSK

02 Please add please add “within the appropriate vegetation natural range of variation”

FW-GDL-WLRSK

Guideline language includes should rather than will.

WLO

FW-DC-WLO

05—Please add “Security is provided for species requiring seclusion”. This is language copied from elsewhere. We would like you to clarify what species that includes.

REC pg 49

As more and more diversified trail user groups take to the HLC Forest in the future, we expect conflicts between user groups to grow. In the Recreation Section, goal component, we would like to see a statement that the forest will work with local user groups from around the GAs to identify potential conflicts and work to resolve them so that all groups will have a positive experience when encountering others on the trails. Working locally, the FS and user groups could establish an information and education program that could include such items as: trail etiquette, how to meet and pass other user types, trail ethics, etc.

We feel there is a strong likelihood that as use grows, conflicts will, unfortunately, also increase. Among non-motorized user groups the most commonly expressed underlying issue causing conflicts is “speed.” Of course, this is usually related to cyclists’ speed when approaching others. With other user groups, we have discussed two potential ways to address this issue of speed, one is establishing a speed limit (maybe something like 10mph). The other is to implement some trail design features and structures that would limit speed in critical areas, which we believe to be the more practical approach. We recommends that the FS consider guideline statements in the recreation and trails sections that would incorporate either, or both, of these approaches to address the speed issue. This could greatly reduce the incidents of conflicts between user groups.

ROS pg 50

Does table 15 represent the desired and existing condition—are they the same or are some changes needed to achieve these numbers? We also ask that the ROS mapping be refined, particularly the primitive acres as appropriate. We also question whether there should be urban settings on part of the forest?

DEVREC pg 50-51

FW-DC-DEVREC

07 Please add “No new facilities should be developed until all existing facilities are fully managed and maintained adequately.”

DISPREC pg 51

FW-DC-DISREC

01 Please replace “minimal environmental impacts” with “that are compatible with other resource desired conditions”.

RSUP pg 52

We are concerned that there are no guidelines for this section. The goal of increasing the diversity of recreation provided by outfitters and guides needs guidelines as to how this will be assessed.

ACCESS pg 52

05—There should be no net increase of system trails unless they are demonstrated to be compatible with other resource DC's.

06—Maintain or increase public access to NFs lands. Obtain public access easements on system roads and trails where they don't currently exist.

07—Unauthorized routes should be reclaimed or restored as soon as possible to avoid more use.

08—Mechanical use is restricted to system trails when their use is appropriate.

There are no goals or guidelines for this section. There should be.

SCENERY pg 53

No comment

WILD and RECWILD and WSA pg 54-58

FW-GDL-WILD

01—Please add “restoration activities (such as management ignited fires, active weed management) may be used in wilderness areas to protect and/or enhance the wilderness characteristics of these areas”.

WSA

Table 18: These acres don't add up.

IRA pg 58-61

FW-DC-IRA

03 Do all the IRAs have high scenic quality? Is this foreground, background, midground? If not, objectives should be established as to how high scenic quality will be established.

FW-GDL-IRA

04 Are planned ignitions compatible with the scenic integrity objective of high.

05—Please add “restoration activities (such as management ignited fires, active weed management) may be used in IRA's to protect and/or enhance the inherent characteristics of these areas”.

FW-SUIT-IRA

01 “Inventoried roadless areas are not suitable for timber production but timber harvest may be allowed for other resource benefits consistent with the 2001 Roadless Area Conservation Rule.” The interpretation of the rule is quite confusing. It would be nice to have it in the management actions as an example of how this

might be determined.

WSR pg 61-67

No comments

CDNST pg 68

FW-DC-CDNST

01—the word “primitive” should be removed as it is incompatible with mechanized use.

LCNHT pg 71-72

No comments (no knowledge here)

We were wondering if the Flathead Indian Trail should be addressed somewhere in the plan?

RNA pg 73

02 “Motorized travel, in both summer and winter, is not suitable within research natural areas except on designated routes.” Please check to insure this is accurate.

LCIC pg 74

No comments

CR pg 75

No comments

TRIBAL pg 76

There are no goals or guidelines for this category. It seems that would be helpful.

LAND pg 77

FW-DC-LAND

01 please add “and other resource desired conditions”

LAND USE pg 77-78

FW-DC-LAND USE

01--Please add “compatible with other resource desired conditions”.

02—Please add “compatible with other resource desired conditions”.

Roads and Trails pg 78-79

The Forest currently finds it very difficult to maintain its current system of trails. We believe that it would be prudent for the Forest to adopt a guideline statement in the Recreation Access section to the effect that there will be no net increase of trail miles unless it can be demonstrated that there will be resources to adequately maintain that increase and that it will be compatible with other resource desired conditions.

Please clarify the introduction with a table that clearly identifies system roads and trails by maintenance level. Closed roads and trails should be separated from system roads and trails.

FW-OBJ-RT

01 Maintain 100 to 500 miles of system road annually. These should be expressed as percentages. Maintenance level should be included. Does this level meet road maintenance standards? If not this level should be set to do that for all maintenance or the system needs to be adjusted accordingly.

02 Maintain 100 to 500 miles of NFS trails annually. These should be expressed as percentages. Maintenance level should be included. Does this level meet trail maintenance standards? If not this level should be set to do that for all maintenance or the system needs to be adjusted accordingly.

FW-GDL-RT

"01 This seems inadequate—runoff and movement to waterways is a concern with all chemicals (pesticides). This should be added to this guideline.

BRDG pg 79-80

FW-GDL-BRDG

02—Please add a guideline for inspection

FAC pg 80-81

FW-GDL-FAC

02—Please add a guideline for inspection

SUS pg 81

FW-DC-SUS

01 Please add "As compatible with other resource dc's" .

GRAZ Pg 82

FW-DC-GRAZ

Do these desired conditions include highly altered streams? It seems some additional language may be necessary for them.

FW-GDL-GRAZ

01 Please add “to meet resource desired conditions”.

03 We suggest that you use less specific language-“based on the latest available scientific classification” (or methodology)

07 Riparian management zones should be cross referenced here. There are implications associated with the zone that could be spelled out more clearly.

Livestock grazing should have some standards that speak to suitability of grazeable lands, compatibility with other resources, etc.

TIM pg 83-86

FW-GO-TIM

03 Please add “and other resource desired conditions”

FW-OBJ-TIM

01 Please clarify the language here. It is very unclear.

03 Please add an objective for restoration with an appropriate number of acres of treatment on suitable and unsuitable lands. Producing a commercial product when feasible is important.

FW-STD-TIM

02 has the appearance of a contradiction. The first sentence says “only” and the last sentence says this may not happen (which is a good thing). We recommend that you add a caveat to the first sentence for clarity.

08 We were surprised to see the 40 acre limit here. Is that prescribed by law/policy? Nice to have the exception spelled out but it is very specific to the moist types. (We don’t have a clear understanding of the harvest methods)

OFP pg 86-87

FW-DC-OFP

01 please add “compatible with other resource desired conditions”

FWL pg 87

FW-DC-FWL

04 Please add “and other resource DC’s”.

SU pg 88

FW-DC-SU

01 Please add “as compatible with other resource desired conditions”

EMIN pg 89-90

FW-DC-EMIN

Well written.

FW-OBJ-EMIN

01 This seems very conservative. Please adjust the minimum and remove the upper limit.

CONNECT pg 90-91

03 Please add an objective for citizen monitoring here

CARB pg 91

Well written

GEOGRAPHIC AREAS

ELKHORNS GA

Pg 118.

Please add this at the beginning of paragraph 2: “This GA is unique on the Forest as it is a designated Wildlife Management Unit. Because of this, in some cases Forestwide direction doesn’t provide enough direction for management of the unit.”

Second to the last sentence of the second paragraph, please include all agencies that are now part of the MOU. A table with a breakdown of acres would be very informative. A map of the ECMA should be added here or referred to.

“This GA is the only one in the plan area where nonforested potential vegetation types are the most common types.” This is true for the ECMA but I don’t believe it is for NFS lands.

Social and Economic Characteristics pg. 119

Please add “The effect of inholdings and housing development in and around this GA have a major social as well as resource impact. “

Cultural and Historical Characteristics

The list of the historical communities is interesting. Please reference where more information and a map may be found. The fact that much of the northwestern part of this area is second growth timber may be of interest. This is true in other GAs such as Divide.

Designated Areas

We would like to see a Congressional designation of the Wildlife Management Unit pursued by the Agency.

Recreation Opportunity Spectrum—pg 120

Please refine the ROS mapping for this GA and update table 54. There is a substantial area of primitive recreation opportunity here, both summer and winter and we would like to see a primitive designation applied. The core area of the Elkhorns clearly provides a primitive recreation experience. Roads in the Tizer Basin core area should be shown with corridors, not a larger polygon. In the northwestern part of the Elkhorns near Strawberry butte, the ROS really offers more of a rural experience, not semi-primitive non-motorized.

Scenic Integrity Objectives

Please update table 55 to reflect the values in table 54.

Plan Components-Elkhorns Wildlife Management Unit (WMU)

Please add “These Plan Components apply to the HLC and B-D NFS lands in the Elkhorn Mountains”.

EH-DC-WMU

- 01** Please add “An Elkhorns Coordinator facilitates cooperation between agencies and ensures Plan compliance for the Elkhorns

EH-GO-WMU

01—please add at the end of the statement “including but not limited to”

03—This appears to be totally out of place here. It was taken out of the '86 plan. If it stays, please clarify the purpose of this study and why it should be in the proposed action document rather than the Monitoring Plan.

EH-SUIT-WMU

03 Please change “motorized” to “mechanized”. The use of mechanized equipment is very disruptive in wintering areas.

Please add 04-“Not suitable for oil and gas leasing. [We believe the Elkhorns were excluded from oil and gas leasing but we don’t know when it was and whether it is still in effect.]

EH-DC-VEGF

The pvt's and fire regimes need to be identified at the GA scale in addition to (or in replacement of) the forestwide goals. Please add a GA level of each table found in the forestwide direction for VEG. Some of the forestwide goals are not meaningful at the scale of a GA. The diversity between the GA's also makes the numbers important for each GA, especially for the nonforested areas.

02 Please substitute "Dry forest types" for "Forest savannas" and add "savannas"

EH-DC-VEGNF

- 01** please have a lower limit for savannas of 5%, the overall range of 5-10%.
- 02** The extent of grassland/shrubland/savanna has decreased drastically. The loss of sagebrush and bitterbrush is particularly striking here. These vegetation types should be "restored and maintained". This should be tied to NRV.

EH-DC-WL

- 02** Please add "compatible with NRV" after "habitat is available". What are species that require seclusion? What are the implications of this DC?
- 03** Please add "Optimize ungulate winter range".

EH-GDL-ACCESS

Please add a guideline: **01** Unauthorized routes should be reclaimed as soon as possible to avoid further use.

02 Mechanized use is restricted to system trails where their use is appropriate.

EH-GDL-RT

Please make a new guideline starting with "Timing restrictions should be placed on road or trail building activities and road or trail use in order to avoid disturbance and displacement of wildlife." We believe this statement is important and stands on it's own.

Please add a guideline: "No new roads or trails should be constructed in wildlife security areas or the IRA unless it can be clearly established that wildlife or roadless characteristics are not negatively impacted and that the proposed routes are compatible with other resource values".

EH-GDL-TIM

01 Please start this guideline with "Commercial". Please define the "non-winter" season.

EH-STD-EMIN

Please classify this GA as unsuitable for oil and gas leasing. Remove the word leasable from guideline 01. Remove guideline 02 altogether.

Please require reclamation of new mining roads and facilities in this GA.